

**JAMES A. SAVILLE, JR. (JS-4835)**  
**KIPP C. LELAND (KL-0932)**  
**HILL RIVKINS & HAYDEN LLP**  
Attorneys for Defendant  
Eurograni S.r.l.

45 Broadway – Suite 1500  
New York, New York 10006  
(212) 669-0600

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Docket No.:1:07-cv-8581(GEL)

PANCOAST TRADING S.A.,	:	
Plaintiff,	:	
<b>- Against -</b>	:	<b>NOTICE OF MOTION</b>
EUROGRANI S.r.l.	:	<b>FOR COUNTERSECURITY</b>
Defendant.	:	<b><u>PURSUANT TO RULE E</u></b>

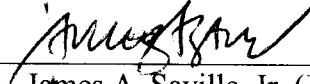
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**PLEASE TAKE NOTICE** that upon the Declaration of James A. Saville, Jr., dated December 11, 2007, with the exhibits annexed thereto, the accompanying memorandum of law and upon all the proceedings heretofore had herein, defendant Eurograni S.r.l. by and through its attorneys HILL RIVKINS & HAYDEN LLP, will move before the Honorable Gerald E. Lynch, United States District Judge, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a time and place to be determined by the Court for an Order pursuant to Rule E(7)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure granting counter-security to Defendant in the amount of USD \$325,185.15, and for such other and further relief as the court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the December 10, 2007, letter of James A. Saville, Jr. duly endorsed by this Court, plaintiff's opposition to defendant's motion must be served and filed by December 17, 2007, and defendant's reply must be served and filed December 17, 2007.

Dated: New York, New York  
December 11, 2007

HILL RIVKINS & HAYDEN LLP  
Attorneys for Defendant  
Eurograni S.r.l.

By: 

James A. Saville, Jr. (JS-4835)  
Kipp C. Leland (KL-0932)  
45 Broadway – Suite 1500  
New York, New York 10006  
(212) 669-0600

TO:

Claurisse Campanale Orozco, Esq.  
Thomas L. Tisdale  
Tisdale Law Offices LLC  
11 West 42nd Street  
Suite 900  
New York, New York 10036